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March 19, 2014

Hon. Richard M. Berman
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 12D
New York, NY 10007

Re: *Patrick Cramer et. al. v. The Calder Foundation, et al.*,
14 CV 1375 (RMB)(RLE)

Dear Judge Berman:

This office represents defendants. Pursuant to this Court's Individual Rule 1.D., enclosed is a proposed So Ordered Stipulation concerning defendants' time to answer, move against, or otherwise respond to the plaintiff's complaint. There have been no previous requests for adjournment or extension and the So Ordered Stipulation is signed by plaintiff's and defendants' counsel. Accordingly, defendants respectfully request that the Court sign the enclosed So Ordered Stipulation.

Respectfully submitted,



Nehemiah S. Glanc

Enclosure

cc: Adam J. Rader w/enclosure

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X 14 Civ. 1375 (RMB)(RLE)

PATRICK CRAMER, suing individually and in
his capacity as Co-Administrator of the Estate of
Gérald Cramer,

ECF Case

Plaintiff,

-against-

**SO ORDERED
STIPULATION**

THE CALDER FOUNDATION a/k/a
THE ALEXANDER AND LOUISA
CALDER FOUNDATION; ALEXANDER
S.C. ROWER, in his individual capacity;
SANDRA CALDER DAVIDSON,
SHAWN DAVIDSON and
ALEXANDER S.C. ROWER, as
EXECUTORS of the Estate of Alexander Calder,
Deceased; and JOHN DOES 1-20.

Defendants.

-----X

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff PATRICK CRAMER, suing individually and in his capacity as Co-Administrator of the Estate of Gérald Cramer, and Defendants THE CALDER FOUNDATION a/k/a THE ALEXANDER AND LOUISA CALDER FOUNDATION, ALEXANDER S.C. ROWER, in his individual capacity, SANDRA CALDER DAVIDSON, SHAWN DAVIDSON and ALEXANDER S.C. ROWER, as EXECUTORS of the Estate of Alexander Calder, Deceased ("Calder Defendants"), through their undersigned attorneys, that:

1. The time for the Calder Defendants to answer, move against, or otherwise respond to Plaintiff's complaint dated February 28, 2014 is extended to and including May 8, 2014.
2. The Calder Defendants waive all jurisdictional defenses pertaining to service of the complaint in this action.
3. This So Ordered Stipulation may be executed in two (2) or more counterparts, each of which shall be deemed an original. A facsimile copy or .PDF image of the signature page of this

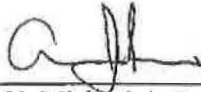
Stipulation is deemed as an original.

Dated: March 19th, 2014
New York, New York

Dated: March 19, 2014
New York, New York

EATON & VAN WINKLE LLP,

AARON RICHARD GOLUB, ESQUIRE, PC



BY: Michael A. Lacher (ML8229)/Adam J. R. (AR3530)
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Attorneys for Plaintiff
Patrick Cramer, suing individually and in
his capacity as Co-Administrator of the
Estate of Gérald Cramer,



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Attorneys for Defendants
The Calder Foundation a/k/a The Alexander
And Louisa Calder Foundation, Alexander
S.C. Rower, in his individual capacity,
Sandra Calder Davidson, Shawn Davidson
and Alexander S.C. Rower, as Executors of
the Estate of Alexander Calder, Deceased

SO ORDERED

U.S.D.J.